

Shawn S. Salehieh SBN 169637
Presidio Law Group APC
1160 Battery Street, Suite 100
San Francisco, CA 94111
Phone: (415)-225-6353
shawn@presidiolaw.com

Attorney for Defendant
YAN CHEN

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

YAN CHEN,

Defendant.

CASE NO. 2:23-cr-00069-JAM

**STIPULATION AND ORDER TO CONTINUE
SENTENCING**

DATE: October 22, 2024
TIME: 9:00 a.m.
COURT: Hon. John A. Mendez

Defendant Yan Chen by and through its counsel of record is requesting a continuance of her sentencing hearing which is presently set for October 22, 2024. AUSA Roger Yang, on behalf of the United States Attorney's Office, and USPO Julie Besabe, on behalf of the United States Probation Office, have no objection to the requested continuance. Counsel for Defendant needs additional time to explain aspects of the pre-sentence report with the aid of an interpreter and to otherwise prepare the defendant for sentencing.

The Parties hereby stipulate to re-set the schedule for the Presentence Report as follows:

Judgment and Sentencing Date: March 11, 2025, at 09:00 a.m.

Reply, or Statement of Non-Opposition: **March 4, 2025.**

Formal Objections to the Presentence Report shall be filed with the Court and served on the Probation Officer and Opposing counsel no later than: **February 25, 2025.**

The Final Revised Presentence Report shall be filed with the court and disclosed to counsel no later than **February 18, 2025.**

Counsel's informal written objections to the Presentence Report shall be delivered to the Probation Officer and opposing counsel no later than: **February 11, 2025.**

The draft Presentence Report was previously disclosed: **September 11, 2024.**

Dated: October 6, 2024

/s/SHAWN S. SALEHIEH
SHAWN S. SALEHIEH
Counsel for Defendant
Yan Chen

Dated: October 6, 2024

PHILLIP A. TALBERT
United States Attorney

/s/ ROGER YANG
ROGER YANG
Assistant United States Attorney

ORDER

IT IS SO ORDERED.

Dated: October 10, 2024

/s/ John A. Mendez
THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE